SRO
STATE SCHOOL REFORM/REDESIGN OFFICE
Michigan Department of Technology, Management and Budget

Unreasonable Hardship Determination Report

Mary McLeod Bethune Elementary – Middle School

February 2017

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Framework

State School Reform/Redesign Office Background and Legal Authority

The State School Reform/Redesign Office (SRO) was established in 2010 to serve as Michigan's academic accountability office. The mission of the SRO is to turn Michigan's Priority Schools into the highest-performing schools in Michigan. The SRO's vision is to create the necessary conditions for a globally superior public education system. To do this, the SRO uses both incentives for academic success and consequences for chronic failure. The following state and federal statutes establish the SRO and govern the office's action steps:

Michigan's Revised School Code 380.1280c: Section 1280c of the Revised School Code charges the SRO with the responsibility of identifying and supervising the lowest achieving 5% of schools (Priority Schools). Priority Schools submit reform/redesign plans to improve performance, and the SRO is granted authority to implement intervention if academic progress is not made (i.e. CEO operator for multiple schools, State School Reform/Redesign District (SSRRD), etc.). Priority Schools are required to submit monitoring reports to the SRO in a manner and frequency as determined by the SRO. The statute also provides exemptions for districts under emergency management.

Michigan's Executive Order No. 2015-9: Executive Order 2015-9 transferred the SRO from the Michigan Department of Education (MDE) to the Department of Technology, Management, and Budget (DTMB). It also transferred all authority, powers, duties, functions, and responsibilities assigned to MDE and the Superintendent of Public Instruction under MCL 380.1280c to the SRO.

Michigan Public Act 192 (i.e. Enrolled House Bill 5384): The law divides the Detroit Public School District (DPS) into two separate districts and requires the SRO to mandate school closures via specified stipulations.

Under these statutes, the State School Reform/Redesign Office must make notifications and issue orders to Public School Academy Authorizers and/or Traditional Public School Superintendents/Board Presidents establishing different levels of accountability based on the performance of the schools they operate/authorize.

Purpose

On January 20, 2017, the SRO published the order subjecting [School] to a Next Level of Accountability pending an Unreasonable Hardship Determination as required under subsection 391(3), MCL 380.391(3). The purpose of this report is to:
- Outline the Unreasonable Hardship Review Process
- Detail the findings of the Unreasonable Hardship Review
- Publish the final Unreasonable Hardship Determination for **Mary McLeod Bethune E.-M.S.** and,
- Detail next steps that the SRO recommends in light of the final Unreasonable Hardship Determination.

Unreasonable Hardship Review Process

In accordance with MCL 380.391(3), the SRO must complete an analysis of whether closure of [**Mary McLeod Bethune Elementary-M.S.**] will result in unreasonable hardship to pupils attending [**Mary McLeod Bethune Elementary-M.S.**]. The SRO will consider other public school options available to students in the grade levels offered and geographic area served by the public school identified for closure to determine if closing the identified school(s) would result in an unreasonable hardship for the impacted students. The SRO is committed to ensuring that the closure of a failing school does not necessitate the enrollment of a displaced student in another failing school. The SRO's Unreasonable Hardship Review will consist of three parts:

1. **Part 1:** A comprehensive review of all available data related to the past and current performance of the identified school(s)
2. **Part 2:** An academic and an operational on-site review
3. **Part 3:** A detailed examination of other public school options available to students in the grade levels offered and geographic area served by the public school identified for closure.

A set of research-based Turnaround Practices served as the framework for the SRO's Unreasonable Hardship Review. The Turnaround Practices[1] are based on both academic and practice-based research on the common characteristics of successful turnaround schools and are organized into five different domains:

- **Domain 1:** Leadership, Shares Responsibility, and Professional Collaboration
- **Domain 2:** Intentional Practices for Improving Instruction
- **Domain 3:** Providing Student-Specific Supports and Instruction to All Students
- **Domain 4:** School Climate and Culture
- **Domain 5:** District System: Districts develop systems to support, monitor, and sustain turnaround efforts

By structuring the SRO's Unreasonable Hardship Review around these domains the SRO is acknowledging that in determining unreasonable hardship one must not only examine historic performance but must also work intimately with local community members and educators to determine if the academic and operational realities of the identified school reflective of a school poised for rapid turnaround.

All of the information produced and insights gained from the Unreasonable Hardship Review Process have informed the SRO's Final Unreasonable Hardship Determination, which consists of a series of 3 Key Questions:

- **Question 1:** Are the academic and operational realities of the identified school reflective of a school poised for rapid turnaround?
- **Question 2:** Are there are sufficient other public school options reasonably available to these pupils?
- **Question 3:** Would the proposed NLA action result in an unreasonable hardship to the displaced pupils?

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[1] See Edmonds, 1979; Bryk et al., 2010; Marzano, 2003; Newmann et al., 2001; Lane et al., 2014)

Unreasonable Hardship Review Part 1: Data Review

In an effort to inform the Unreasonable Hardship Determination, the SRO requested a comprehensive set of both academic, cultural, and operational data from [**Mary McLeod Bethune Elementary-M.S.**]. The data provided can be viewed in Appendix A. In reviewing this data as well as previously state-reported academic data, the SRO has identified the following Key Takeaways related to the past, and current realities of [**Mary McLeod Bethune Elementary-M.S. School**].

Data Review Key Takeaways

- **Academic** (Domains 2 and 3)
  - Proficiency
    - Between 2014 and 2016 the percent of proficiency demonstrated for all students in Mathematics grew from ▮▮▮▮▮
    - Between 2014 and 2016 the percent of students with disabilities that demonstrated proficiency in Mathematics grew from 17.02% to 18.75%
    - Between 2014 and 2016 the percent of proficiency demonstrated for all students in Reading/ELA dropped from 21.18% to 9.03%
    - Between 2014 and 2016 the percent of students with disabilities that demonstrated proficiency in Reading/ELA grew from 14.89% to 18.18%
    - Between 2014 and 2016 the percent of proficiency demonstrated for all students in Science grew from ▮▮▮▮▮
    - Between 2014 and 2015 the percent of students with disabilities that demonstrated proficiency in Science grew from 5.56% to 7.69%
    - Between 2014 and 2016 the percent of proficiency demonstrated for all students in Social Studies dropped from ▮▮▮▮▮
    - Between 2014 and 2016 the percent of students with disabilities that demonstrated proficiency in Social Studies were at ▮▮ for all three years
  - Student Instructional Support Systems (Interventions)
    - ALEKS Differentiated Reading (K-5), Leveled Literacy Intervention
    - Social/Emotional/Behavioral Intervention Systems: QPR: Suicide Prevention Training
      - Culturally Responsive Teaching Training
      - Life Skills (Botvin): Alcohol Prevention
      - Parent Training, Strengthening Families (Parent Cafe)
      - Positive Behavior Interventions and Supports System (PBIS) PD and implementation
      - Mental Health - School-Based Health or Community Mental Health System
      - Anti-Bullying and Anti-cyberbullying system
      - Youth leadership structures
      - Student support team structure
      - Cross-systems meetings with school support staff and community mental health
      - Mental Health Town Hall for staff, parents and teachers
  - Curriculum
    - ELA: Engage NY

- Math: Eureka Math/ Engage NY
- Science: Oakland MAISA Rubricon
- Social Studies: Oakland MAISA Rubricon
- **Climate and Culture** (Domains 3 and 4)
  - o Enrollment
    - Between 2014 and 2016, enrollment dropped from 649 to 532 (117 student difference)
    - Between 2014 and 2016 the number of economically disadvantaged students increased from 487 to 525 (38 student difference).
    - Between 2014 and 2016 the percentage of economically disadvantaged students grew from 75.0% to 98.7%.
    - African Americans consistently make up 99% or more of the student population.
    - Between 2014 and 2016 the greatest decline in student enrollment occurs in grade 8 from 76 to 47 students.
    - First grade was the only grade to have an increase in student enrollment from 44 to 46 students.
  - o Attendance
    - Between 2014 and 2016 the attendance rate has dropped from 92.9% to 87.6%.
    - Between 2014 and 2016 the percentage of chronically absent students has significantly increased from 14.7% (99 students) to 65.3% (333 students).

- **Professional** (Domains 1 and 5)
  - o Teacher Evaluation
    - Between 2014 and 2016 the number of teachers increased by 11, growing from 20 to 31.
    - There were no teachers rated as highly effective in 2014 or 2016.
    - The number of teachers rated as effective decreased from 20 (100%) in 2015 to 15 (48.4%) in 2016.
    - There were 16 teachers rated as marginally effective or ineffective in 2016.
    - In 2016, 15 (48.4%) teachers were rated as marginally effective.
    - In 2016, 1 (3.2%) teacher was rated as ineffective.

Unreasonable Hardship Review Part 2a: Academic On-Site Review

On February 6, 2016, representatives of the SRO conducted the Academic On-Site Review for [**Mary McLeod Bethune Elementary-M.S.**]. The purpose of this visit was to gain valuable insight related to the current academic realities of [**Mary McLeod Bethune Elementary-M.S.**] from its building leaders, teachers, parents and community members. The Academic On-Site Review was structured as follows:
- Interviews with Building Leadership
- Building Walk-Through with Classroom Observations
- Teacher Leader Focus Group
- Student Focus Group
- Parent/Community Focus Group

In a letter sent on January 23, 2017, the SRO requested that **Mary McLeod Bethune Elementary-M.S.** nominate both teacher leaders as well as parents and community members to participate in the Academic On-Site Review.

The review was structured around the research-based Turnaround Practices and the questions that served to frame both the interviews as well as the focus group discussions were structured around the five different domains described above. The responses from each conversation were amalgamated and the responses were evaluated for their alignment with a series of best-practices for high-gain, rapid turnaround schools. The rubric evaluations as well as the SRO's Key-Takeaways are outlined below.

Rubric Descriptors

Strong alignment with best practice	Moderate alignment with best practice	Low alignment with best practice
All indicators are evident and there is strong evidence that key structures and practices are being used effectively to improve instruction.	Some of the indicators are evident and there is some evidence that key structures and practices are being used effectively to improve instruction.	A few or none of the indicators are evident and/or there is little to no evidence that key structures and practices are being used effectively.

A key purpose of the site visit is to assess each school's capacity to engage in accelerated turnaround and to inform decisions regarding unreasonable hardship. As such, site reviewers and the SRO are focused on the following overarching questions.

Domain 1: Leadership, Shares Responsibility, and Professional Collaboration	Domain 2: Intentional Practices for Improving Instruction
• Does the school have a collaborative environment (e.g., sufficient teaming structures and ways of working together) that can lead to accelerated instructional improvement? • Does the school leadership have systems in place to monitor and support the implementation of improvement strategies, including the use of frequent classroom observations?	• Does the school utilize a common core curriculum that is instructionally coherent and that displays a strong understanding of high quality instruction, among teachers and as supported and observed by administrators? • Does school leadership have a system in place to identify teachers that may need additional support, and specific strategies for providing such support?
Domain 3: Providing Student-Specific Supports and Instruction to All Students	**Domain 4: School Climate and Culture**
• Does the school have and actively utilize a system of assessments and interventions capable of providing student-specific supports and subsequent monitoring of the effectiveness of interventions?	• Does the school provide a safe, orderly, and respectful environment for students and a collegial and professional culture among adults?

Determining Capacity for Successful Turnaround

Key Question 1: What are the core issues and challenges that have kept students at your school from achieving? How are you addressing these issues and challenges?

Key Question 2: What are the key practices and strategies that distinguish your school, and will allow your school to improve, leading to increased student achievement in the near future?

	Alignment with Best Practice
Adaptive Instructional Improvement All stakeholders espouse an "improvement mindset" reflected in the school's continuous review and assessment of improvement practices and strategies used within the school. Key Indicators • The school stops or modifies strategies that are not working and expands those that are working.	
Respectful and Trusting Learning Environment All stakeholders (students, teachers, community members, etc.) have high expectations for students and value working with and learning from each other. Key Indicators • Parents and students state that they believe that all of the students in the school will succeed (e.g., will do well in classes, graduate, attend and graduate college). • Teachers and administrators work together in formal and informal teams on a regular basis.	
Instructional Rigor Instruction and instructional practices are engaging, differentiated, and sufficiently challenging for all students. Key Indicators • Teachers provide all students with lessons and instruction directly aligned with common core standards and aligned instructional practices. • Written lessons and taught instruction includes stated and written learning objectives, multiple instructional strategies, and challenging (e.g., higher order) tasks, problems, and questioning strategies.	
Targeted Interventions The school expertly uses specific instructional strategies/interventions executed with a high degree of instructional expertise. Key Indicators • Student work is consistently improving. • Instructional strategies and interventions are implemented with fidelity.	

- Building leadership presented a significant list of programs and projects the students and teachers were involved with, with a large number of them being initiated within the last twelve months.
- According to the teachers, they were committed to stay at the building because of the leader.
- According to the leadership team, the building leader has full autonomy in staffing.

Turnaround Strategy Domain 1: *Leadership, Shard Responsibility, and Professional Collaboration*

According to the leadership team, the school has established a community of practice through leadership, shared responsibility, and professional collaboration.

Key Question: How, and to what extent, do you (and your leadership team) cultivate shared ownership, responsibility, and professional collaboration in the school?

Turnaround Strategy Components	Alignment with Best Practice
Teaming, Shared Leadership and Responsibility, and Collaboration Distributed leadership structures and practices are apparent throughout the school building in the form of an active and well-represented Leadership Team and grade-level and vertical teams. Key indicators: • The school leadership team meets regularly and includes representation from all grades and student needs. • Grade-level and vertical teams meet regularly. • Teams exhibit a strong commitment to high expectations for all students and a willingness to work together to improve instruction.	
Using Teams, Shared Leadership, and a Collaborative and Trusting Environment to Accelerate Improvement Administrators and teachers (through teacher teams or involvement in the leadership team) are monitoring and assessing the implementation and impact of key improvement strategies, use of resources, classroom instructional practices, and non-academic supports on student achievement. Key indicators: • **Adaptation:** Leadership has the demonstrated ability to adapt, innovate and do whatever it takes to improve student achievement. • **Instructional Observation:** Instruction is formally and informally observed and meaningful feedback is provided. Teachers, as well as students, are held to high expectations.	

- Principal is in first year. Is highly regarded by teachers, parents, community, and students.
- Principal said that 50% of students have met or exceeded their target in grade-level exercises. She stated that it was a huge accomplishment from previous year.
- The building leadership team has organized and funded AmeriCorps program for teachers, and this could be managed better.
- The building leadership team does walkthroughs to look at student exit tickets to observe student academic performance, etc.
- The SRO representatives observed several classrooms which offered low skill lessons with intermediate to low levels of student engagement.
- Building leaders report that if teachers are inflexible with respect to their use of data, it can delay their understanding of what is happening in classrooms and ultimately, their ability to make mid-course corrections or changes to teaching strategies. The leadership see this as their role and opportunity to promote change incrementally.

Turnaround Strategy Domain 2: *Intentional Practices for Improving Instruction*

According to the building leadership, the school uses an aligned system of common core curricula, assessments, and common instructional practices across the school and content areas, and employs intentional practices for improving teacher-specific and student-responsive instruction.

Key Question: What are the strategies and practices that you and your colleagues used to improve instruction? How did you work to improve teachers' instruction? What worked, what didn't, and why?

Turnaround Strategy Components	Alignment with Best Practice
Common core curriculum and aligned and rigorous instructional practices. Administrators and teachers develop and use vertically and horizontally aligned curricula and instructional strategies that includes common units, lessons, assessments, and instructional strategies and language within and across grades and content areas. Key indicators: - Teachers' unit and lesson plans are similarly structured, incorporating best practices, directly linking lesson content with the grade-level standards and standards taught in prior and subsequent grades. - A common set of instructional strategies, academic language, and other learning tools are evident in lessons and in practice, to enable students to access content.	
Defined expectations for high quality instructional practices The school has a clear instructional focus and shared expectations for instructional best practices that address students' instructional needs. Key indicators: - Leaders and teachers understand the instructional focus and how the instructional focus informs (or is evident in) classroom practice. - Teachers have received training and professional development on the instruction focus and related instructional strategies.	
Teacher support and feedback to improve instruction Teachers are actively supported to develop high quality lessons, deliver high quality lessons and instruction and to become experts in using and refining effective instructional strategies. Key indicators: - The principal (or administrators or coaches) spend significant time in classrooms, observing teachers' instruction and providing teachers with constructive and useful feedback on instructional practices. - Teachers (and teacher team) use a variety of standards-based assessments to assess the effectiveness of instructional strategies and modify instruction accordingly.	

- According to the teachers, they feel supported by the administration.
- According to the building leadership, parents seem to expect more from teachers than teachers can expect from them, which has created challenges. The challenges could be mitigated through greater teacher-parent connections. According to the community, the principal is helping with this process.

- An appropriate level of lesson rigor was not observed in most classrooms, and large percentages of students were observed as being disengaged or not sufficiently challenged in those same classrooms.
- Teachers reported many different academic levels of students in each classroom. They also said that there were many dynamics to plan for as teachers.
- According to the teachers, professional development for teachers could be improved in order to nurture more high-achieving learners.
- The teacher focus group reported that teachers have fairly diverse skillsets. Leaders discuss and dialogue with them, and encourage teachers to find their own path of improvement. This process included relationship, watching teachers, monitoring lessons, giving feedback and doing all that supports them in this process.
- The Leadership Team reported that they are more focused on NWEA than M-STEP because their district's teacher evaluations use NWEA measurements as part of their overall evaluation. This disconnect means that instruction is not fully aligned to tested curriculum. It is possible for teacher to support both NWEA and MSTEP content, but it is not clear if the internal capacity exists within the school to accomplish this activity.
- A building walkthrough with the SRO representatives revealed an intensive focus on centers for learning in early grades. Unfortunately, most of the centers observed were not implemented in a way that sufficiently challenges all students as they move toward proficiency.
- The building leadership and teachers both reported that attendance (or lack of) is reported as a major issue, with solutions not readily apparent or available at the current time.

Turnaround Strategy Domain 3: *Providing Student-Specific Supports and Instruction to All Students*

The building leadership stated that the school is able to provide student-specific supports and interventions informed by data and the identification of student-specific needs

Turnaround Strategy Components	Alignment with Best Practice
Tiered and Targeted Interventions for Students and Monitoring for Effectiveness The school has a system (structures, practices, resources) for providing targeted instructional interventions and supports to all students which also includes close monitoring of the impact of tiered interventions on students' progress. Key indicators: • Students are provided with targeted, student-specific instruction and interventions in direct response to their academic areas of need, rather than placing entire groups of students in intervention groups. • The impact of classroom-based and tiered interventions is frequently monitored (e.g., regularly, in 2, 4, or 6 week intervals and often by grade-level teams or by school support teams) and then refined in direct response to students' needs.	
Data Use and Data Informed Targeting of Interventions Administrators and teachers use a variety of ongoing assessments (formative, benchmark, and summative) to frequently and continually assess instructional effectiveness and to identify students' individual academic needs. Key indicators: • A variety of valid and reliable assessments (standards-based and performance assessments) are used consistently, within and across grades and content area. • Administrators and teachers are using assessment to identify the specific students needing additional support and the targeted areas of need for each specific student.	

- The Leadership Team has tried many interventions to assist with student supports.
    - For example, 6th graders were being rambunctious and energetic, even wrestling. Instead of detention, they were assigned to help with breakfasts. They became the B-squad and it has resulted in months of service from the students and no disciplinary behavior.
- The Student focus group reported that they really liked their school and appreciated their role in helping to bring change. They saw that they needed to take a greater leadership role in bring student body changes.
- Students also expressed that they were concerned with spending extra time on material because low level learners slack off. What should take a day takes a week. One solution could be to set up honors classes and even honors classes within classrooms to sufficiently engage and challenge higher-proficiency learners.
- Tiered interventions in reading were reported by teachers as starting in 2012, but not evidenced in full operation during walkthroughs. Other subjects may need similar approaches.
- Teachers reported that individualized plans with students are updated weekly, but this was contradicted by classroom observations that appeared to treated all students as the same.

- Standardized testing occurs three times a school year. Also, in class interventionists test every two weeks.

Turnaround Strategy Domain 4: *School Climate and Culture*

The school has established a climate and culture that provides a safe, orderly and respectful environment for students and a collegial, collaborative, and professional culture among teachers that supports the school's focus on increasing student achievement.

Key Question: How does your school attend to students' social-emotional health and establish a safe, orderly, and respectful environment for students?

Turnaround Strategy Components	Alignment with Best Practice
Safety and secure learning environment. The school has established and provides a safe and secure learning environment for students, staff and community members. Key indicators: • Student to student interaction and teacher to student interactions are respectful and considerate, as observed during the visit.	
Shared Behavioral Expectations that support student learning Administrators and teachers have and use a clearly established set of behavioral expectations and practices that supports students' learning. Key indicators: • Expectations of student behavior are written and clearly shared and understood throughout the school building. • Behavioral expectations are reinforced through consistently applied rewards and consequences (consistent among and across teachers and grades).	
Targeted and effective social-emotional supports The school has identified, established, and proactively provides effective social-emotional resources and supports for students in need of such supports and assistance. Key indicators: • The school has identified a wide array of effective social-emotional responses and supports for students in need of such assistance and support. • Students that may need or benefit from social-emotional supports are identified and receive targeted social-emotional support. • Data on the effectiveness of social-emotional supports is collected and monitored.	

- Many parents serve as volunteers and one even worked as school nurse when funds could pay it. Some of the community members stated that they have grandchildren attending this school. One parent stated that her daughter was the 4th generation of her family enrolled in the school.
- They reported that this school is all they know and all their children know.
- Parents expressed a desire for more connection with the school
- A parent said, "I am confident that hearing what I have heard today, we can come up with a turnaround plan for this school."

- Multiple school closures occurred nearby in the past, and four were named. A community member expressed concerns about transportation because she purchased her home in the area because she wanted her child to be able to walk to school.
- School personnel also reported that they connect students with in-school and out of school services through social workers:
    - Parents can use computers at the school to fill out job applications

Turnaround Strategy Domain 5: *District System to Support Accelerated Improvement and Turnaround*

The district has developed systems for identifying schools that are not performing well, and strategies for monitoring and supporting school leadership and teachers.

  Examples of district systems:
- *Strategic placement and assignment of principals and teachers in high need schools, including the use of incentives to get the right leaders and teachers in high need schools.*
- *Provision of additional staffing and resource autonomy to leaders in high need schools*
- *Provision of additional supports (e.g., coaching supports, instructional resources) to high need schools.*

Key Questions:
- How does the district monitor and/or support you in your efforts to improve instruction and raise student achievement?
- To what extent has the district provided you with additional autonomy to make changes to staff (e.g., to hire new teachers and/or quickly remove teachers not supportive of your work), to the school's schedule, and in your use of resources? How much autonomy do you have?\

	Alignment with Best Practice
District Capacity - Core Functions The District has established and/or provides schools with base supports necessary for effective teaching and learning (Core curriculum and professional development, assessments, data systems, instructional materials, human capital).	
District capacity - Monitor and support The district has established and communicated a district-wide improvement strategy, including a vision and specific goals for improvement. The improvement strategy includes specific strategies for monitoring and supporting schools (leaders, teachers, and students).	
District Capacity – Conditions and Autonomy The district provides schools with sufficient autonomy and authority to implement turnaround actions, while holding schools accountable for results.	

- Teachers expressed that the district had a high focus on NWEA student aggregate level improvement and teachers reported that their teacher evaluations came from this NWEA data.
- Teachers reported frustration that the state was so focused on the MSTEP and felt it was a district problem that the two tests (NWEA & MSTEP) were not aligned.

Unreasonable Hardship Review Part 2b: Operational On-Site Review (Facility Conditions Index)

The SRO partnered with DTMB's Facilities & Business Services Administration Office (SFA) to determine a facility conditions index (FCI) for **Mary McLeod Bethune Elementary-M.S.** The FCI measures maintenance and repair costs against current replacement cost of the building. The lower the number, the less cost effective it is for the district to keep the building open.

All inspections were designed to be non-intrusive and the results were based on observations and assumptions given the factual knowledge provided.

FCI SCORE: 51

A copy of DTMB's FCI report is attached to this report as Appendix B.

Unreasonable Hardship Review Part 3: Access and Availability

Whether statutorily required under MCL 380.391(3), MCL 380.507(6), MCL 380.528(6), or MCL 380.561(6), or optionally adopted under MCL 380.1280c, the SRO is committed to completing an analysis of whether the proposed closure will result in unreasonable hardship to pupils attending **Mary McLeod Bethune Elementary-M.S.**. The SRO will consider other public school options available to students in the grade levels offered and geographic area served by **Mary McLeod Bethune Elementary-M.S.** to determine if the closure would result in an unreasonable hardship for the impacted students. The SRO is committed to ensuring that any closure does not necessitate the enrollment of a displaced student in another failing school. When evaluating the sufficiency of other public school options for affected pupils and unreasonable hardship, the SRO evaluates a variety of factors that can generally be organized into three different categories. These categories include, but are not limited to:

- **Geography**: Are there schools within a reasonable number or miles from the school identified that serve the same grade levels as the identified school?
- **Performance**: Are there schools that were identified during the geographic evaluation that also have an acceptable Top-to-Bottom ranking?
- **Access**: Do the students that would be displaced by the NLA Action have reasonable access to the schools identified during both the geographic and performance evaluations?

The results of the SRO's analysis are included in the below table. The number of schools that meet the parameters defined in the left most two columns is included in column #3 and the estimated capacity of the qualifying schools is included in column #4. The right-most two columns define the # of qualifying schools that would not require students to utilize the schools-of-choice legislation (MCL 388.1705/MCL 388.1705c) to gain access and the estimated capacity of those qualifying schools that would not require utilization of the schools-of-choice legislation.

Distance Parameter (Maximum in miles)	TTB Ranking Parameter (Minimum)	# of Qualifying School-of-Choice Schools	Estimated Capacity of Qualifying School-of-Choice Schools	# of Qualifying Local Access Schools	Estimated Capacity of Qualifying Local Access Schools	Total # of Qualifying Schools that Displaced Students Could Access	Total Estimated Capacity of Qualifying Schools that Displaced Students Could Access
5	25	3	10	6	233	9	243
10	25	12	47	25	1757	37	1804
15	25	35	113	33	1959	68	2072
20	25	49	184	44	2269	93	2453
25	25	70	330	50	2336	120	2666
30	25	114	628	53	2365	167	2993

Unreasonable Hardship Data Key Takeaways

- There are three accessible schools of choice that are qualifying and that are located nearby, within five miles, even though parents, teachers and the leadership team seemed to suggest otherwise. These three schools could accommodate up to 10 students.
- It appears that this school has an even greater number of accessible local access schools, up to 6 within a 5-mile radius and 25 within a 10 mile radius.
- The total number of schools within a 10 mile radius that are accessible is 37 schools, and could accommodate up to 1804 students.
- Community members and parents expressed that it would be very difficult for walking students to be able to find transportation to a new school location.

Unreasonable Hardship Review Part 4: Final Determination

The SRO's Final Unreasonable Hardship Determination is based on a comprehensive review of all available data, the results from both operational and academic on-site review visits and an examination the other public school options that are available to the students that would be impacted by the closure of **Mary McLeod Bethune Elementary-M.S.** All of the information produced and insights gained from the Unreasonable Hardship Review Process that have been detailed in this report, were considered when answering the three key questions that comprise the SRO's Final Unreasonable Hardship Determination.

Question 1: Are the academic and operational and academic realities of the identified school reflective of a school poised for rapid turnaround?

|	
	The academic and operational realities of the identified school reflective of a school poised for rapid turnaround.
	The academic but not the operational realities of the identified school reflective of a school poised for rapid turnaround
	The operational but not the academic realities of the identified school reflective of a school poised for rapid turnaround
	Neither the academic nor the operational realities of the identified school reflective of a school poised for rapid turnaround

Question 2: Are there are sufficient other public school options reasonably available to these pupils?

	There are sufficient other public school options reasonably available to these pupils?
	There are insufficient other public school options reasonably available to these pupils?

Question 3: Would the proposed NLA action result in an unreasonable hardship to the displaced pupils?
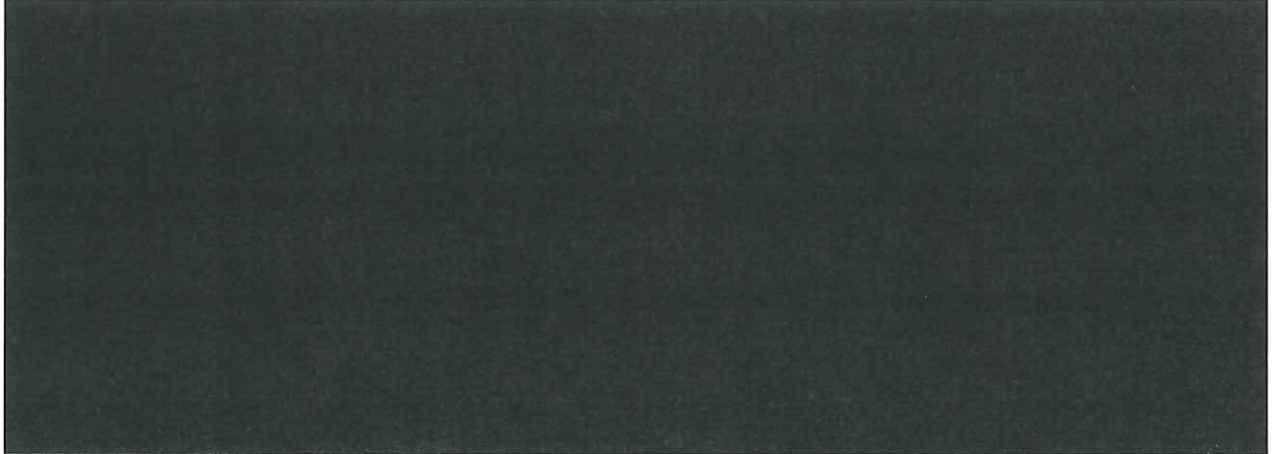
	The proposed NLA action would not result in an unreasonable hardship to the displaced pupils
	The proposed NLA action would result in an unreasonable hardship to the displaced pupils

Determination:
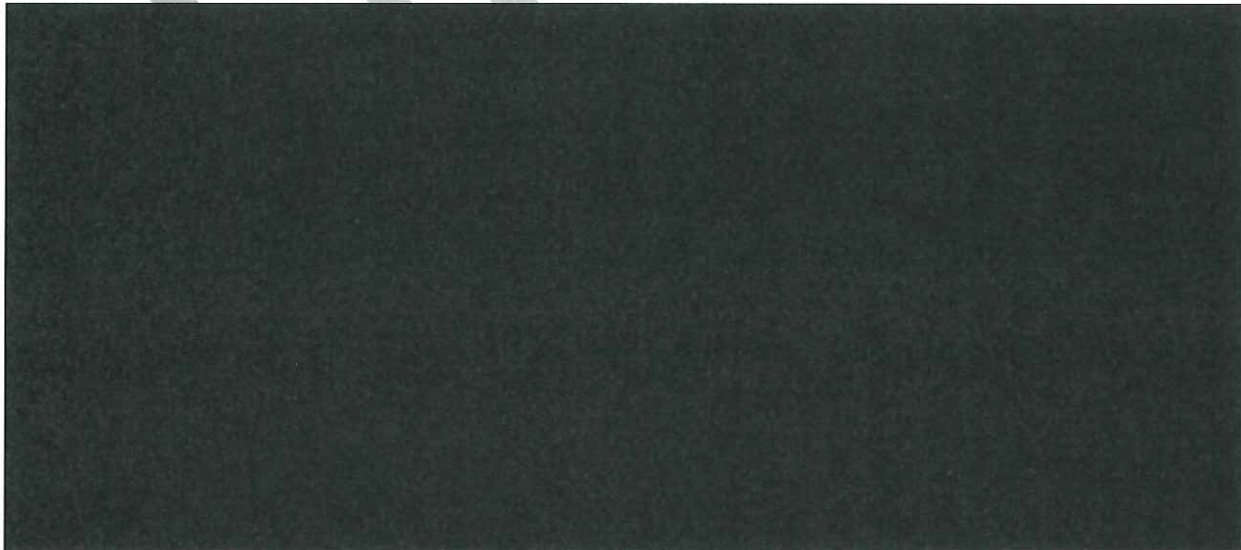
Next Steps:

APPENDIX A: SRO Unreasonable Hardship Data Request Packet

The SRO is committed to ensuring that the Unreasonable Hardship Determination required under MCL 380.391(3), MCL 380.507(6), MCL 380.528(6), MCL 380.561(6), or optionally adopted under MCL 380.1280c is as informed as possible. Therefore, the SRO is requested that the following information be provided in an editable format (e.g., .doc, .docx, .xls, .xlsx, etc.) by Tuesday, February 1, 2017. Where possible, the information provided will be verified against previously reported and publically available data.

Data review components:
- Academic
- Climate and Culture
- Professional
- Operational

Academic Data

Top-to-Bottom Rankings by Year

2012	2013	2014	2015	2016
3	3	2	1	4

Student Proficiency – Mathematics

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students			
Native American			
Asian			
African-American			
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged			
Students with Disabilities (IEP & 504)	17.02	19.44	18.75
English Language Learners			

Student Proficiency – Reading/ELA

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students	21.18	7.59	9.03
Native American			
Asian			
African-American	21.29	7.59	9.03
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged	21.43	6.08	8.74
Students with Disabilities (IEP & 504)	14.89	20	18.18
English Language Learners			

Student Proficiency – Science

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students			
Native American			
Asian			
African-American			
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged			
Students with Disabilities (IEP & 504)	5.56	7.69	
English Language Learners			

Student Proficiency – Social Studies

Student Group	% Proficient or Above 2013-2014	% Proficient or Above 2014-2015	% Proficient or Above 2015-2016
All Students			
Native American			
Asian			
African-American			
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged			
Students with Disabilities (IEP & 504)			
English Language Learners			

Climate and Culture Data

Enrollment by Subgroup[2]

Race	2013-2014	2014-2015	2015-2016
All Students	649	587	532
Male	318	283	253
Female	331	304	279
Native American			
Asian			
African-American	647	586	531
Hispanic			
Native Hawaiian, Pacific Islander			
White			
Multi-Race, Non-Hispanic			
Economically Disadvantaged	487	457	525
Students with Disabilities (IEP & 504)	54	35	34
English Language Learners			

Enrollment by Grade

	K	1	2	3	4	5	6	7	8	9	10	11	12	Total
2013-2014	75	66	73	82	74	69	66	68	76	0	0	0	0	649
2014-2015	82	59	76	72	61	71	49	66	51	0	0	0	0	587
2015-2016	60	80	55	71	59	54	57	49	47	0	0	0	0	532

Special Population Percentages

	2013-2014 (%)	2014-2015 (%)	2015-2016 (%)
English Language Learner			
Students with Disabilities (IEP & 504)	8.3%	6.0%	6.4%
Economically Disadvantaged	75.0%	77.9%	98.7%

Attendance

	2013-2014	2014-2015	2015-2016
Attendance Rate (%)	92.9%	80.2%	87.6%
Percent Chronically Absent	14.7%	79.0%	65.3%
Chronically Absent Student Count	99	424	333

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[2] Enrollment by student(s) does not necessarily indicate that the student(s) will take state assessments.

Professional Data

Teacher Evaluations

	# of Teachers 2013-2014	% of Teachers 2013-2014	# of Teachers 2014-2015	% of Teachers 2014-2015	# of Teachers 2015-2016	% of Teachers 2015-2016
Highly Effective	0	0.0%	2	5.4%	0	0.0%
Effective	20	100.0%	16	43.2%	15	48.4%
Marginally Effective	0	0.0%	18	48.7%	15	48.4%
Ineffective	0	0.0%	1	2.7%	1	3.2%

Total Teachers	20		37		31	